

Case 1:13-cv-02811-PKC Document 396 Filed 03/23/18 Page 1 of 2

LOVELL STEWART HALEBIAN JACOBSON LLP

61 Broadway, Suite 501
New York, New York 10006
www.lshllp.com

MEMO ENDORSED

March 23, 2018

BY ECF

Hon. P. Kevin Castel
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Sullivan, et al. v. Barclays plc, et al., No. 13-cv-2811 (S.D.N.Y.) (PKC)

Dear Judge Castel:

Pursuant to Section 1.B. of Your Honor's Individual Practices, Plaintiffs respectfully submit this letter in order to make this unopposed request for an extension of 14 days to the deadline for the completion of all expert discovery relating to class certification (from July 27, 2018 to August 10, 2018) and for Plaintiffs' motion for class certification (from August 1, 2018 to August 15, 2018).¹ No prior requests for this relief have been made. The requested extension would amend only two deadlines in the April 10, 2017 Scheduling Order (ECF No. 337), as modified by the November 17, 2017 Revised Case Management Plan and Scheduling Order (ECF No. 377), and will not affect any other scheduled dates. Such extension will not prejudice the administration of justice in any way. Plaintiffs respectfully request that the Court approve the enclosed Proposed Amended Scheduling Order, which also includes interim deadlines relating to class certification that Plaintiffs and Non-Settling Defendants have agreed to. The Non-Settling Defendants consent to Plaintiffs' request.¹

For the foregoing reasons, Plaintiffs respectfully request that the Court grant the requested relief.

Thank you very much.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3-23-18

¹ Citigroup Inc., Citibank, N.A., JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A.

Case 1:13-cv-02811-PKC Document 396 Filed 03/23/18 Page 2 of 2

Hon. P. Kevin Castel
March 23, 2018
Page 2 of 2

Respectfully submitted,

/s/ Christopher Lovell
Christopher Lovell
Lovell Stewart Halebian
Jacobson LLP
61 Broadway, Suite 501
New York, New York 10006
Tel.: (212) 608-1900
Fax: (212) 719-4677
clovell@lshllp.com

/s/ Vincent Briganti
Vincent Briganti
Lowey Dannenberg, P.C.
44 South Broadway
Suite 1100
White Plains, New York 10601
Tel.: (914) 997-0500
Fax: (914) 997-0035
vbriganti@lowey.com

cc: All Counsel of Record (by ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEPHEN SULLIVAN, WHITE OAK FUND LP, CALIFORNIA STATE TEACHERS' RETIREMENT SYSTEM, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT PARTNERS TRADING FUND, L.P., AND FRONTPOINT AUSTRALIAN OPPORTUNITIES TRUST on behalf of themselves and all others similarly situated,

Plaintiffs,

- against -

BARCLAYS PLC, BARCLAYS BANK PLC, BARCLAYS CAPITAL INC., BNP PARIBAS S.A., CITIGROUP, INC., CITIBANK, N.A., COÖPERATIEVE CENTRALE RAIFFEISEN-BOERENLEENBANK B.A., CRÉDIT AGRICOLE S.A., CRÉDIT AGRICOLE CIB, DEUTSCHE BANK AG, DB GROUP SERVICES UK LIMITED, HSBC HOLDINGS PLC, HSBC BANK PLC, ICAP PLC, ICAP EUROPE LIMITED, J.P. MORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., THE ROYAL BANK OF SCOTLAND PLC, SOCIÉTÉ GÉNÉRALE SA, UBS AG AND JOHN DOE NOS. 1-50,

Defendants.

Docket No. 13-cv-02811 (PKC)

ECF Case

**[PROPOSED] AMENDED SCHEDULING ORDER REGARDING
CLASS CERTIFICATION PROCEEDINGS**

The April 10, 2017 Scheduling Order, as amended by the November 17, 2017 Revised Case Management Plan and Scheduling Order, is modified as follows:

Event	Existing Deadline	Modified Deadline
Completion of expert discovery relating to class certification.	July 27, 2018	August 10, 2018
Deadline for plaintiffs to file motion for class certification.	August 1, 2018	August 15, 2018

The Court further approves the following additional deadlines relating to class certification, as agreed to by the parties:

Event	Deadline
Plaintiffs' class certification expert report(s) due.	April 16, 2018
Defendants' class certification expert report(s) due.	June 14, 2018
Plaintiffs' class certification rebuttal report(s) due.	July 13, 2018
Defendants' opposition to motion for class certification due.	October 15, 2018
Plaintiffs' reply in support of their motion for class certification due.	November 29, 2018

In all other respects, the April 10, 2017 Scheduling Order, as amended by the November 17, 2017 Revised Case Management Plan and Scheduling Order, remains in full force and effect.

IT IS SO ORDERED.

DATED: _____

P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE